

1. I am one of the attorneys for Plaintiff Doris Jones in this action, and

1 authorized to speak on behalf of Plaintiff, the other members of Plaintiff's trial team, and
2 the Plaintiffs' Steering Committee for purposes of this affidavit and the instant motion.

3 2. Plaintiff and the Plaintiffs' Steering Committee believe that communicating
4 with the Jones jurors about their answers to the interrogatories discussed in the motion
5 will maximize the benefit of the bellwether process by allowing them to learn how neutral
6 finders of fact view the cases in this MDL based on the evidence presented at trial.

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8 3. The jurors in this case were deadlocked after approximately 10 hours of
9 deliberations and informed the Court they were at impasse. Only after the Court gave an
10 instruction to keep deliberating did they jury come back with a defense verdict.

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12 4. Plaintiff and her counsel are concerned that there was a fundamental
13 misunderstanding by the jurors that they could hold their positions and that a mistrial and
14 another trial at a later date would result.

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16 5. Notably, at least three jurors were visibly emotional when they were polled,
17 strongly suggesting that they truly would have found for the Plaintiff but felt that they
18 needed to capitulate to reach a unanimous verdict before the weekend.

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20 6. Plaintiff, her counsel, and the Plaintiff's Steering Committee believe that
21 determining exactly how divided the jury was and why they ultimately reached a defense
22 verdict is important information that will help both sides resolve other cases in this MDL.

23 7. Plaintiff, her counsel, and the Plaintiff's Steering Committee believe that
24 there is good cause to support this motion and that granting the requested relief will help
25 the parties and the Court prepare for future trials and more accurately determine the value
26

1 of other cases for settlement purposes.

2 Further Affiant Sayeth Naught.

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5 
LINCOLN COMBS

6 SUBSCRIBED AND SWORN to before me on this 28th day of June,

7
8 2018, by LINCOLN COMBS.



11 
12 Notary Public

13 My Commission Expires: May 8, 2020

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